



King County Executive
RON SIMS

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September 10, 2001

Lou Driessen, Project Manager
Bonneville Power Administration
PO Box 3621
Portland, Oregon 97208

Dear Mr. Driessen:

Thank you for the opportunity to review the Draft Environmental Impact Statement for the Kangley-Echo Lake Transmission Line Project. Ample and reliable electrical power service is of course necessary for our region; however, locating and constructing new transmission lines inevitably creates substantial impacts. For this reason, the EIS must clearly demonstrate why a new transmission line corridor is necessary to ensure system reliability and, if so, include thorough analysis of potential impacts and adequate mitigation for those identified impacts.

The foothills of the Cascades are a high value forest resource. The Cedar River Watershed encompasses a unique lowland forest that will be protected in perpetuity, thanks to the City of Seattle's vision and commitment. Together, the Cedar River Watershed and the Raging River valley form a critical ecological connection between the Cascade Mountains, Tiger Mountain State Forest, Taylor Mountain and Rattlesnake Ridge, providing a crucial wildlife corridor between the foothills and the higher elevation forests of the Cascades. King County has been making tough choices to ensure compliance with the Endangered Species Act, and has been implementing a variety of programs to maintain the forest land base for its economic and habitat values. The City of Seattle is working to implement their Habitat Conservation Plan for the Cedar River Watershed. A new transmission line through the forest lands of the Raging River valley and the Cedar River Watershed will affect these efforts, and we anticipate that as a public agency, BPA will seek to work cooperatively with us and with the City of Seattle to make sure our efforts are not diminished.

National Environmental Policy Act regulations require that an EIS discuss possible conflicts between the proposed action and local land use plans and policies. The 2000 King County Comprehensive Plan includes policies encouraging energy conservation and calling for the use of existing transmission corridors first:

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- F-303 Efficient energy consumption, conservation, the use of renewable technologies, and energy responsible land use decisions should be a priority in King County. King County promotes the maximum use of energy conservation and renewable energy resources now, while leaving options for increasing conservation and renewable technologies in the future.
- F-310 When new, expanded or upgraded transmission is required, use of existing corridors that have above-ground utilities should be evaluated first. King County should facilitate appropriate corridor sharing among different utility types and owners.

The EIS should include a more in-depth analysis of how the proposal complies with these policies. Specifically, the EIS should include an explanation of the electrical transmission system serving the King County area, and an analysis that shows the current situation, how conservation could alleviate future needs and other improvements BPA is considering in the future. The analysis should demonstrate why an increase in service is necessary.

Further, it appears possible to double service by rebuilding the existing transmission towers within the current corridor to accommodate two sets of circuits, but the DEIS dismisses this alternative as too difficult in the short term. A broader analysis of the regional system should be included in the EIS to demonstrate whether or not the system has sufficient flexibility to allow for this alternative, which best meets policy F-310, above. Constructing a new transmission line adjacent to the existing corridor as proposed is less disruptive than the other alternatives and therefore preferred, but should only be considered if rebuilding in the existing corridor is clearly demonstrated to be unworkable.

The 2000 King County Comprehensive Plan also includes a body of policies addressing protection of forest resources and environmental features that have not been considered in the DEIS. Transmission lines have had substantial impacts on forests, related wildlife, streams and wetlands. The proposal would result in further loss and fragmentation of active forest land and wildlife habitat, and the impacts of construction and operation could adversely affect compliance with the Endangered Species Act and diminish efforts to recover salmon and other listed species. The proposal also brings added risks to protecting water quality in a watershed that supplies drinking water for much of the county. These impacts are significantly downplayed in the DEIS, and the proposed mitigation measures are inadequate to offset the impacts.

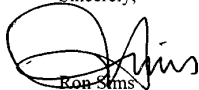
If use of the existing corridor proves to be unworkable, the proposal will be a substantial project consisting of nine miles of new 500kV transmission line, with a cleared swath at least 150 feet wide through mature forest and crossing rivers, streams and wetlands. It also includes construction of at least a mile and a half of new road, three staging areas of undetermined size and location, plus a three-acre expansion of an existing substation. None the less, the project is described as affecting only "...relatively small areas..." and resulting in "...only a low impact." The DEIS also fails to discuss the cumulative impacts of transmission lines criss-crossing the forests of this region, rating the impact of forest loss as low.

As a partner in the region, we expect an earnest analysis of the impacts of the proposal on forest resources, habitat and water resources, and look forward to working with BPA to identify appropriate mitigation. The most reasonable mitigation for any permanent damage or loss of forest land and habitat is replacement. Within King County, any lost wetland habitat must be replaced at a 2:1 ratio. King County has worked to assemble blocks of forest land in the vicinity of the project; there are several parcels adjacent to King County's assembled lands and the City's Watershed, as well as parcels in the upper Rock Creek valley and along the Green River that would be excellent candidates for forest land and habitat replacement for land lost through the project.

Further, the Raging and Cedar River riparian areas provide especially important habitat for terrestrial species. As the forest in the Cedar River Watershed grows, this area could provide significant habitat for spotted owls and marbled murrelets, and murrelets may be using the upper Watershed today. Transmission lines crossing the Raging and Cedar Rivers should be high enough to allow coniferous forests to grow to maturity in the riparian zone of the river and adjacent slopes.

At this time, the EIS inadequately addresses the need to construct a parallel transmission line, the full range of impacts of the preferred alternative, conflicts with King County policy and the appropriate mitigations for the full range of impacts. We look forward to working with you to resolve these deficiencies, and to help you select replacement lands for lost forest resources and habitat. For assistance, please contact Lori Grant, King County Office of Regional Policy and Planning, at 206-296-3458.

Sincerely,

A handwritten signature in black ink, appearing to read "Ron Sims", is written over a circular stamp or seal.

Ron Sims
King County Executive

cc: Pam Bissonnette, Director, Department of Natural Resources
Stephanie Warden, Director, Office of Regional Policy and Planning
ATTN: Lori Grant, Office of Regional Policy and Planning